

August 1, 2025

BY ECF

Hon. Sarah L. Cave
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Dorce, et al. v. City of New York, et al.*, No. 1:19-cv-02216 (JLR) (SLC)

Dear Judge Cave:

Pursuant to the Court's order dated June 18, 2025 (ECF No. 444), the parties respectfully submit this joint update regarding the status of their settlement discussions.

On June 25, 2025, Plaintiffs provided Defendants with a draft term sheet regarding the material terms and conditions of the contemplated settlement that the parties have agreed to in principle regarding the proposed Third Party Transfer Round 10 class. Municipal Defendants are working internally, and with the Office of the New York City Comptroller, on comprehensive comments to the draft term sheet. On July 30, 2025, Municipal Defendants stated that they expect to send those comments to Plaintiffs within two weeks (*i.e.*, by August 13, 2025). The parties also continue to work on negotiating a potential settlement of the Rounds 1 through 9 claims.

The parties respectfully propose to again jointly update the Court regarding the status of their settlement discussions and related matters by August 28, 2025, and respectfully request that the stay of this case be extended up to and including that date.

Respectfully submitted,

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cc: Counsel of Record (via ECF)